

Bazala, Jan

From: dougballou@comcast.net
Sent: Sunday, January 11, 2015 8:28 PM
To: Bazala, Jan
Cc: Gaya, Holly; Snell, Marty; Pat & Ron Price
Subject: Fwd: CLARK COUNTY SEPA DNS from Community Development: Title 40 Updates - Home Business Ordinance and Multi-Family Zoning Code COMMENTS DUE BY THURSDAY, JANUARY 15, 2015

Jan--

Please include Ron Price's note to me as part of the public comment. Ron is a former neighborhood association leader and concerned about the impacts this change will have on neighborhoods.

Thanks.

Regards,
Doug Ballou
Chairman, NACCC

From: ronpat11@comcast.net
To: "Doug Ballou" <dougballou@comcast.net>
Sent: Sunday, January 11, 2015 3:59:29 PM
Subject: Re: CLARK COUNTY SEPA DNS from Community Development: Title 40 Updates - Home Business Ordinance and Multi-Family Zoning Code COMMENTS DUE BY THURSDAY, JANUARY 15, 2015

Doug, although I am not involved in the Neighborhood Association, I would agree with you and not support the change. Even in our small Home Owners Association, we had a person running a business out of their home and it was a mess, commercial and employee vehicles parked all over. The issue was resolved but I would be very reluctant to any change that would lessen the restrictions on a businesses being run out of a residence. Thank you for allowing me to see this and give input.

Ron Price

From: "Doug Ballou" <dougballou@comcast.net>
To: "Doug Ballou" <dougballou@comcast.net>
Sent: Wednesday, December 31, 2014 1:47:41 PM
Subject: FW: CLARK COUNTY SEPA DNS from Community Development: Title 40 Updates - Home Business Ordinance and Multi-Family Zoning Code COMMENTS DUE BY THURSDAY, JANUARY 15, 2015

Dear Neighborhood Leaders

See item one in the proposed updates to County Development Code. Please send me your comments on this change. I will say, generally, I am opposed to this change as it could adversely impact livability in county residential zoned areas but am open to learning more about rationale for change. We will discuss at January 12th NACCC meeting and consider response to this change.

Thank you.

Regards,

EXHIBIT #

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Doug Ballou
Chairman, NACCC

From: McCall, Marilee [mailto:Marilee.McCall@clark.wa.gov]

Sent: Wednesday, December 31, 2014 11:17 AM

To: Bazala, Jan

Cc: 'Stephan Abramson'; 'Allan Brettman'; 'U.S. Fish & Wildlife Service'; 'Anitra Gorham'; 'Anne Friesz'; 'Art Edgerly'; 'Peeler, Ben'; 'VaNessa Duplessie'; 'Jeff Barsness'; 'Brent Grening'; 'Bjerke, Bill'; 'Barbara Meisenheimer'; 'Robert Elliott'; 'Brendan Addis'; 'Bridget Schwarz'; 'Snodgrass, Bryan'; 'Ken Burgstahler'; 'Chris Chandler'; 'Sowder, Carla'; 'Carol Levanen'; 'Environmental DNS'; 'Eiken, Chad'; 'Friends of Clark County'; 'Cook, Christine'; 'Christine Fossett'; 'Mark Collier'; 'Guardino, Corrie'; 'Val Alexander'; 'Columbia River Inter-Tribal Fish Commission'; 'Nisqually Indian Tribe'; 'Bill Fashing'; 'Dana Allen'; 'Vial, Dave'; 'Dave Socolofsky'; 'David Taylor'; 'David Ripp'; 'Dawn Tarzian'; 'Dennis R. Dykes'; 'Dennis Mason'; 'Development Review'; 'Denny Kiggins'; 'Smith-Lee, Doug'; 'Doug Ballou'; 'Eric Eisemann'; 'Eric Fuller'; 'Erin Erdman'; 'Clifford Aaby'; 'Fox Desk'; 'Sandra Bennett'; 'Lucas, Garry'; 'Milada Allen'; 'Chehalis Tribal Council'; 'Gene Eckhardt'; 'WA Department of Ecology (GMA Coordinator)'; 'Brooks, Gordon'; 'Heather Acheson'; 'Heidi Rosenberg'; 'Christie BrownSilva'; 'Ike Nwankwo'; 'Ila Stanek'; 'Confederated Tribes of Grand Ronde'; 'Port of Vancouver'; 'James Howsley'; 'James Howsley'; 'Niten, Jeff'; 'Jeff Hamm'; 'Jennifer Halleck'; 'Green, Jerry External'; 'Muir, Jim'; 'Jim Irish'; 'Justin Keeler'; 'Jennifer Keene'; 'WA Department of Corrections'; 'Berg, Jo Anne'; 'Joe Jones'; 'Joe Steinbrenner'; 'Kevin Jolma'; 'Dunaway, Jon'; 'Jeff Sarvis'; 'Jackie Spurlock'; 'John Karpinski'; 'Ken Berg'; 'Ken Hadley'; 'Kent C. Landerholm'; 'Karin Ford'; 'Katherine Klockenteger'; 'KOIN'; 'Kelly Parker'; 'Bonneville Power Administration'; 'Lisa Cartwright'; 'Valenter, Lynn'; 'David, Lynda'; 'Mary Beth Lynn'; 'Marc Krsul'; 'Margen Carlson'; 'Mark Mansell'; 'Marnie Allen'; 'Ransom, Matt'; 'Jeff Carothers'; 'Mike Bomar'; 'Michael Jackson'; 'Mike Means'; 'Mike Nerland'; 'Mitch Kneipp'; 'Aeronautics Division'; 'Mark R. Feichtinger'; 'Neil Chambers'; 'KGW'; 'Nick Redinger'; 'Jason Lyon'; 'Paul Scarpelli'; 'Pam Mason'; 'City Parks and Recreation'; 'Phil Bourquin'; 'Patty Boyden'; 'Cowlitz Indian Tribe'; 'E.Elaine Placido'; 'Wendy Garrett'; 'Randy Kline'; 'Randall Printz'; 'Confederated Tribes of Warm Springs'; 'Development Review'; 'Facilities Department'; 'Richard Till'; 'Rebel Martin'; 'Robert Maul'; 'Klug, Rob'; 'Robert Whitlam'; 'Robert Hubenthal'; 'Roger Entrekin'; 'Ron Onslow'; 'Rob Pearson'; 'Robin Shoal'; 'Towne, Sandra'; 'Sandra Yager'; 'SEPA Center'; 'SEPA REVIEW'; 'Christie BrownSilva'; 'Scott Koehler'; 'Sean McGill'; 'Amanda Smeller'; 'Stacey Shields'; 'Woodland School District #404'; 'Stephanie Rice'; 'Steve Stuart'; 'Wrightson, Steve'; 'Steven Manlow'; 'Judy Bumbarger-Enright'; 'Troy Drawz'; 'Lisa Renan'; 'Leavitt, Tim'; 'Redline, Tina'; 'Vancouver School District'; 'Sue Lintz'; 'Eldon/Venus Kohler'; 'Teresa Torres'; 'Vicki Fitzsimmons'; 'Wagner, Don'; 'J. Tayloe Washburn'; 'SEPA Notifications'; 'Wuanita Herron'; 'Euler, Gordon'; 'Orjiako, Oliver'

Subject: CLARK COUNTY SEPA DNS from Community Development: Title 40 Updates - Home Business Ordinance and Multi-Family Zoning Code COMMENTS DUE BY THURSDAY, JANUARY 15, 2015

A SEPA Determination of Non-Significance (DNS) notification/checklist and associated information are attached to this email.

Title 40 Update: Amend the County's Home Business Provisions (Section 40.260.100) to remove the limit on the maximum number of non-resident employees for Major Home Businesses.

Project Manager: Jan Bazala; email: jan.bazala@clark.wa.gov or phone 360-397-2375 ext. 4499.

Title 40 Update: Amend the County's "multi-family" zoning code (Section 40.220.020) to prohibit new single family detached dwelling developments in the R-12, R-18, S-22, OR-15, OR-18, and OR-22 zoning districts.

Project Manager: Jan Bazala; email: jan.bazala@clark.wa.gov or phone 360-397-2375 ext. 4499.

For the details to this proposal, please see links to the Staff Reports that will be posted by the end of the day on January 6, 2015 at <http://www.clark.wa.gov/planning/PCmeetings.html> under January agenda topics.

Comments on the proposals are due by 5 p.m. on January 15, 2015.

Please feel free to call our office or the listed project manager if you have any questions.

Marilee McCall / Administrative Assistant

Clark County Community Planning

360-397-2280 ext. 4558

1300 Franklin Street | Vancouver, WA 98660

P.O. Box 9810 | Vancouver, WA 98666

www.clark.wa.gov/planning

This e-mail and related attachments and any response may be subject to public disclosure under state law.

Neighborhood Associations Council of Clark County

January 12, 2015

Board of Clark County Councilors
Councilor David Madore, Chair
Councilor Tom Mielke
Councilor Jeanne E. Stewart
P. O. Box 5000
Vancouver, WA 98666-5000

RE: Comments on proposed amendments to the County's Home Business provision.

Dear Councilors:

This letter is in regard to the proposed amendment to the County's Home Business provisions (Section 40.260.100) to remove the limit on the maximum number of non-resident employees for Major Home Businesses.

I am writing on behalf of the Neighborhood Associations Council of Clark County (NACCC), representing 29 Clark County Neighborhood Associations and have approximately 150,000 people who live within these neighborhood boundaries.

We agree that home businesses provide an important contribution to our local economy and should be encouraged and supported without undue regulation. In fact, section 40.260.100 as written currently does just that by allowing home businesses in residential zoned neighborhoods with up to three employees. We know many people who operate successful home businesses within the provisions of this code. They do not create a neighborhood nuisance by going beyond what the code provides. When a business grows to the point where more than three employees are needed then it is time for that business to consider relocation to a commercial/industrial zoned employment areas where their business does not have an employment constraint.

NACCC and its membership, leaders of County neighborhood associations, believe that to remove the employee limit would result in a negative impact on the quality of life in residential neighborhoods with regard to public safety, welfare, transportation and infrastructure needs. **We request that no changes be made to Section 40.260.100 (Home Business Provisions) of the County Code.**

Thank you for this opportunity to comment on this proposed amendment to the County's Home Business provisions.

Sincerely,



Doug Ballou
Chairman, NACCC

cc: Mark McCauley, County Manager
Marty Snell, Director, Community Development
Jan Bazala, Planner II, Community Development
Clark County Planning Commission
NACCC Membership and Neighborhood Representatives

EXHIBIT #

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Bazala, Jan

From: Karen Underhill <karenumn@gmail.com>
Sent: Tuesday, January 13, 2015 8:26 PM
To: Bazala, Jan
Subject: Proposal to eliminate the limitation on the number of employees allowed in major home business in both urban and rural areas.

Hello Jan,

Please share my concerns with the commissioners regarding the proposal to eliminate the limitation on the number of employees allowed in major home business in both urban and rural areas.

Home businesses should be for an individual who lives in a home and goes elsewhere to do their work or has an office in their home. Turning a home into a business location goes against all zoning in my opinion.

Keeping our home values high and friendly means keeping them a home not a business. Please do not allow employees to work out of a home. Get an office space--there are lots of vacant office spaces all over Clark County--help small businesses to find ways to lease commercial space so we clean up the vacant buildings and vagrants loitering around them. That would be a win.

We just bought a home here because we wanted to get to know our neighbors and be around families and kids. Not businesses.

Thank you!

--

Karen Underhill
karenumn@gmail.com
651-485-6069

EXHIBIT # 3

Valerie Alexander
2404 NW Coyote Ridge Rd.
La Center, WA 98629

January 13, 2015

Board of Clark County Councilors
Councilor David Madore. Chair
Councilor Tom Mielke
Councilor Jeanne E. Stewart
P. O. Box 5000
Vancouver, WA 98666-5000

RE: Comments on proposed amendments to the County's Home Business provision.

Dear Councilors:

This letter is in regard to the proposed amendment to the County's Home Business provisions (Section 40.260.100) to remove the limit on the maximum number of non-resident employees for Major Home Businesses.

I am a founding board member of Friends of Clark County and would like to make a comment on their behalf.

First of all, you have set the comment period deadline for January 15th. The Planning Commission has requested that you continue a hearing until after a possible March hearing. This is a decision that will affect many rural residents and deserves much more consideration than has been offered.

The purpose of Section 40.260.100 was to assure compatible land use in urban and rural areas of the county. Allowing unlimited off-site employees could bring chaos to some areas, where residents would be unable to enjoy the life style that they purchased their property for. We urge you to delay a decision until after the Planning Commission members have had a chance to review the proposed changes and more comments from the public can be submitted.

To proceed with this policy could bring Growth Management Hearings Board litigation.

Thank you for your time,

Valerie Alexander

EXHIBIT #

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From: Steve and Denise Asplund
To: Bazala, Jan
Subject: Comment on Proposal To Eliminate the Limit on Number of Employees In Home Run Businesses
Date: Wednesday, January 14, 2015 5:43:29 PM

Dear Ms. Bazala,

I am writing to voice my concern with the county proposal to remove the limitation on the number of employees in home-run businesses. I am recommending not to change, but to continue the current limit from two employees per home. I feel that the amendment removing the limit would have an impact on neighborhood quality of life, impact street parking in neighborhoods and cause noise levels to rise. Commercial zoning is there for a reason, and I feel that if a home-owned and located business grows to the point where the needs for extra employees has become apparent, then there should be a relocation to a commercial building with unrestricted numbers of employees. It just makes good sense not to change it for the worse.

Thank you for listening to my opinion. I live in the Sunnyside area of Orchards.

Sincerely,

Steve Asplund
10500 NE 85th St.
Vancouver, WA 98662

EXHIBIT # 5

I am opposed to the removal of the limit on employees of home businesses in urban county neighborhoods. This is a direct threat to the health and livability of Clark County residents.

I speak from experience. A person moved next door to us and eventually established a home business involving repairing and installing heating, ventilation, and air conditioning systems. Then he added general contracting and began breaking county codes. He had several employees and at least two business related vehicles. The employees parked in the cul-de-sac, in front of our home. Sometimes the vehicles would block a foot or two off our driveway. Other times they would park in front of our waste and recycling containers we would place on the sidewalk the night before pick-up. There was an extended period of time when three of his workers took up all the available spaces in the cul-de-sac, even though county code required our neighbor to provide parking for his employees.

Other violations: (1)parking a flat-bed trailer in his driveway for a few weeks with a back-hoe sitting on it. (2)buying, repairing, and selling cars (3)repairing a commercial fishing boat, flushing the chemicals and fuel into the street and storm drain system. (4) storing flammable fuel and chemicals in his garage in several 55 gallon barrels.

Every violation was reported by us to the Clark County Code Compliance. That department diligently responded to our complaints to the best of their ability. They were at our neighbor's home numerous times. He was fined and was asked to report to the department to discuss his noncompliance. These problems continued for about three years. We were relieved when his property entered foreclosure and he had to move.

EXHIBIT # 6

This person also had more serious anti-social behaviors. In several instances, he performed work without permits and with an expired contractor's license. He installed another neighbor's home furnace without the electrical and mechanical permits because his license was expired.

He knew we were talking to the County Code department. One day my husband was driving home. The person being discussed saw him coming and drove his jacked-up pickup down the middle of the road right at my husband's car. Husband had to veer off onto the side of the road. This incident was reported to Sheriff's Office, and a deputy was seen at his home shortly after.

Neighbor told me husband, "Man-up, come into the cul-de-sac, and we'll have this out." He is at least 25 years younger than my husband, who was then in his early sixties. My husband declined.

He also aggressively pulled out in front of my husband's car in the Lowe's parking lot, cutting him off, and forcing him to brake hard. The next morning after he left his home for the last time, I found a large rubber sex toy in my back yard.

I am relating these incidents because none of these would have occurred if the Clark County Code contained adequate enforcement. We have no quarrel with the wonderful county employees whom we encountered. However, they are not given the tools to enforce the rules. This created a volatile situation with our neighbor. Both my husband and I feel fortunate that we escaped unharmed, unlike the woman who was shot on Halloween day by her neighbor. Because the county was unable to enforce the code against her neighbor, she and

her husband were forced to take him to court. His answer was to attempt to take her life.

At this time, we have another person in our neighborhood with a home business violating the code; we saw people hosing down carpet cleaning equipment into the street and storm drain. Three company vans are parked at the home at various times.

If we are to have home businesses in our neighborhoods, there must be rules that are enforceable. Regulations should be strengthened, not loosened. Allowing home businesses to have more employees defies common sense. The county code is not being enforced now. Residents should not be pitted against violators, putting themselves in danger. The force of law should instead be present.

Judy Bumbarger-Enright

Vancouver, Washington

Bazala, Jan

From: foleyjw@comcast.net
Sent: Wednesday, January 14, 2015 8:37 AM
To: Bazala, Jan
Subject: Proposal to eliminate limitation on number of employees in home business

Jan Bazala

I live in Clark county at 10914 NE 88th St (Vancouver). I bought a new home (Aho Constuction in Silver Star area) and moved in two years ago. My street is very narrow and parking is extremely limited. We bought in this neighborhood for several reasons, one of which was it was quiet and few cars drive on our street.

One of my concerns with this proposal is parking. I do not know the limit of employees in home businesses now, but If my neighbor decides to start a home business and requires say just 5 employees, they would have to park in front of 5 homes and most likely across the street from one another. That would require cars to drive down the middle of street and have to wait in front of driveways while another car in the opposite direction goes by. I am not interested having to negotiate an obstacle course to just drive on our street!

There are many reasons for land parcels to be marked commercial and other parcels to marked residential - noise, environmental, overloading the drainage, sewage, and water restrictions built into the neighborhood to name just a few. Lets not soften or allow work arounds on those basic fundamentals and restrictions built into our neighborhoods for very practical, environmental, engineering, and business reasons.

I can just imagine my neighbor with a home business wants to run it now 24 hours a day. Where does the concessions end??

He now wants to add two floors to his house and make his driveway go across his entire front of the house.

BTW We already have one home on our street that evidently has a business elsewhere, but employees drive to his house and park and carpool to work and when we drive pass his house we have to negotiate with cars coming the opposite direction to drive pass his house. It is not everyday, but enough to see a potential problem if more home businesses start up.

The population density in Clark county is almost the highest in the state. This would just add to the issues accompanying high population density - more noise, more traffic on streets in residential zones, more sewage and more garbage produced than anticipated/expected in residential areas, and more crime. Who are these new employees and what do they care about keeping our neighborhood clean, safe, and quiet.

Please help keep our county residential area **residential**, not commercial!

Concerned citizen of Clark County
James W Foley

From: Euler, Gordon
To: Bazala, Jan
Subject: FW: Proposed Home Business Ordinance change
Date: Thursday, January 15, 2015 9:01:34 AM

Jan:

For the record.

Gordy

From: Ann Foster [mailto:annfoster5093@gmail.com]
Sent: Tuesday, January 13, 2015 10:32 PM
To: Mielke, Tom; Madore, David; Euler, Gordon; Stewart, Jeanne; R N S Barca; McCauley, Mark; Snell, Marty
Subject: Proposed Home Business Ordinance change

To:
Board of Clark County Councilors;
Councilor David Madore. Chair
Councilor Tom Mielke
Councilor Jeanne E. Stewart
Clark County Community Planning
Clark County Planning Commission

RE: Proposed Home Business Ordinance

Ladies and Gentlemen:

These comments are in regard to the proposed amendment to the County's Home Business provisions (Section 40.260.100) to remove the limit on the maximum number of non-resident employees for Major Home Businesses. I have reviewed the ordinance and listened to the October Board meeting in which this ordinance was discussed.

Although I participate in a number of community activities and organizations in Clark County, I am speaking only on behalf of myself.

In particular, as an organizer of farmers markets in Clark County, I can not emphasize enough the importance of enabling and accommodating entrepreneurs and their micro businesses (10 employees or less). I see how regulations and barriers defeat all sorts of food, ag, and artisan businesses on a regular basis. I, as do the other farmers markets in Clark County, work tirelessly on behalf of the small farms and businesses who access our markets and never, never stop providing benefits to the public.

These businesses, as micro businesses and small businesses, respect current ordinances and choose to reside in legitimate locations.

However, to lift the ban on the number of employees that a home business in a rural location can hire – WITHOUT ANY RESTRICTION WHATSOEVER – is bad governance. Good, fair and reasonable governance would be to consider keeping the ban but lifting the number

EXHIBIT #

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of employees allowed , and basing that number on the type of business, location, impact on neighborhood, traffic, noise, and hours of operation. It is only logical and reasonable that, at some point, a business, with a specific number of employees in a rural location, needs to relocate to property that is legitimately zoned as commercial/light industrial.

Given the stated proposal, to remove the employee limit – in its entirety – can not be supported, as much as I support relieving small businesses of unreasonable regulation. Having no limits, no restrictions, runs the risk of having a negative impact on those folks who have invested their dollars in a life style and quality of life that is only available in a rural environment. This is not fair treatment of Clark County residents.

Regards,
Ann Foster,
Organizer, Salmon Creek Farmers Markets
Board, Washington State Farmers Market Association
Member, Clark County Food System Council
Member, Friends of Clark County
Vice President, North Salmon Creek Neighborhood Association

"Clark County farmers markets....working for healthy communities and thriving farms".

Bazala, Jan

From: St. Pierre, Holly
Sent: Thursday, January 08, 2015 4:39 PM
To: Bazala, Jan
Subject: DEAB Motion for PC
Attachments: Holly St. Pierre.vcf

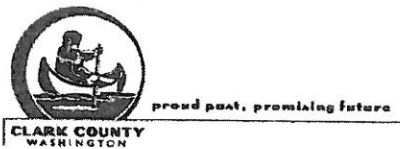
DEAB has significant concerns regarding the legal, technical, practical and philosophical issues of the Code Amendments for the HOC and MF Zones. We were made aware of the proposed amendments only today. Therefore, we recommend the PC push this off their agenda until next month to allow DEAB to submit comments for both amendment items.



Holly St. Pierre
CLARK COUNTY
Assistant to Marty Snell
COMMUNITY DEVELOPMENT
(360) 397-2375 , ext. 4936 xWork
Holly.St.Pierre@clark.wa.gov
PO Box 9810
Vancouver, WA 98666-9810
www.clark.wa.gov

EXHIBIT #

9



DEVELOPMENT and ENGINEERING ADVISORY BOARD

February 9, 2015

Clark County Board of Councilors
Attn: Jennifer Clark
P.O. Box 5000
Vancouver, WA 98666-5000

Re: Proposed Amendment to County's Medium Density Residential Code 1-6-2015

To the Board of County Councilors,

The Development and Engineering Advisory Board (DEAB) has reviewed documents and proposals regarding the proposal to amend the County's Medium Density Residential Code. **DEAB has some concerns regarding the proposed change.**

The proposed change would prohibit detached single family residences in the R-12, R-18, and R-22 zones. Construction of detached residences in these zones has become a very popular way of providing an entry level home type and is essential in providing affordable housing in Clark County, especially as land development costs have risen and the average cost of larger lots has increased substantially. This type of housing is not currently practical in any other zone in the county. This change would force apartments or attached homes (townhomes) and prohibit detached dwellings. While both housing types have their place, this proposal limits flexibility, housing choices, and restricts market freedom. In addition, attached housing has a similar cost to construct but is not as desirable and doesn't hold its value as well as detached housing. While this suggested change may be well intentioned, it likely stems from a few undesirable examples of very narrow homes that are the exception rather than the norm. It appears this may be a case of overreaction and essentially "throws the baby out with the bath water."

In our opinion, there is a better way to address the concern. Perhaps it can be addressed with a minimum lot width that could be applied to detached single family lots in the affected zones. Currently the minimum lot width is 25' which would allow a 17' wide unit. Perhaps increasing the minimum lot width to 28' for detached homes would address the concern. There have been countless well constructed, desirable, and successful projects in these zones with lots between 28'-35' wide. Attached are two examples of neighboring attached and detached homes in the R-18 zone. We believe most Clark County residents would prefer the detached

EXHIBIT # 10

homes in their neighborhoods. We understand the concern is that we may be creating "tomorrow's slums." But we would argue that eliminating the detached option moves in the wrong direction. This example of a detached neighborhood is less likely to be tomorrow's slum than the attached product and will likely hold its value much better.

In addition, these zones are being referred to as "Multifamily zones" which insinuates they should prohibit detached single family dwellings. But these zones are actually called "Residential Districts" and are intended to provide for medium and higher density residential development. While R-30 and R-43 are typically multifamily higher density zones, R-12, R-18, and R-22 zones are medium density zones. Detached single family housing is appropriate and many times the most desirable and lowest impact housing type in these zones.

When we discussed this in our most recent DEAB meeting, staff had some concern that allowing detached single family in these districts may be in conflict with policy 2.7 in the comprehensive plan, because it could contribute to a situation where detached single family might make up more than 75 percent of any product type in any jurisdiction. DEAB disagrees with the justification because staff's concern is based on an analysis of acreage of land in each zone and not the number of actual housing units. That methodology fails to account for the fact that there will be a substantially higher unit count per acre in higher density zones.

In addition, while staff has focused some of their justification for prohibiting detached single family residences in the R-12, R-18, and R-22 zones on the idea it helps create a potential violation of policy 2.7 in the comprehensive plan, it can be argued that prohibiting the detached residences in these zones would violate other sections of the comprehensive plan requiring providing for affordable housing. RCW 36.70A.020(4) which is the Housing Goal of GMA states that these are the goals for comprehensive plans and development regulations to "encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock."

It is our understanding that the county developed policy 2.7 in an effort to satisfy the affordable housing goal of RCW 36.70A.020(4) by determining that a 25% multifamily and 75% single family mix would appropriately provide for affordability of housing. It is our belief that the main issue here is defining the objective of creating this affordability. Unless the objectives of affordability are further defined by the county, it seems like affordability can be equally achieved by meeting the residential density in each zone whether the units are attached or detached. Arguably, single family detached lots could be considered a form of multifamily by their lot sizes meeting the density requirement of the medium density zones rather than solely basing the definition of single family vs. multifamily on whether the housing unit shares walls with an adjacent unit.

In summary, DEAB opposes the proposed change. We understand the concern regarding very narrow homes but feel the concern would better be addressed through increasing the minimum lot width. Prohibiting detached single family dwellings in these zones restricts

market freedom, creates additional barriers to providing affordable housing for entry level owners, and is likely to result in less desirable neighborhoods.

Please let us know if you have any questions.

Respectfully,



Andrew Gunther,

Chair, Development and Engineering Advisory Board

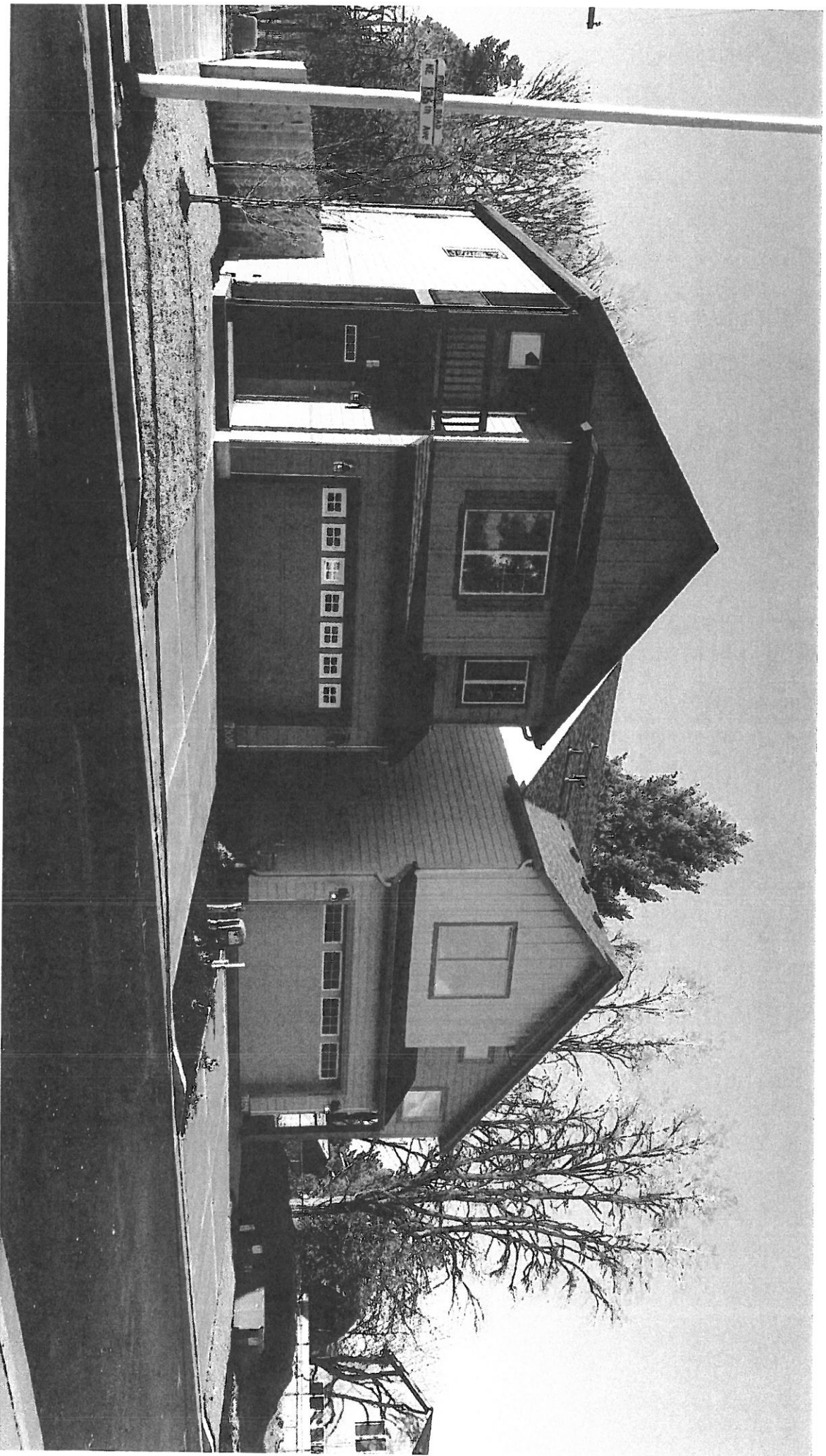


Eric E. Golemo, PE

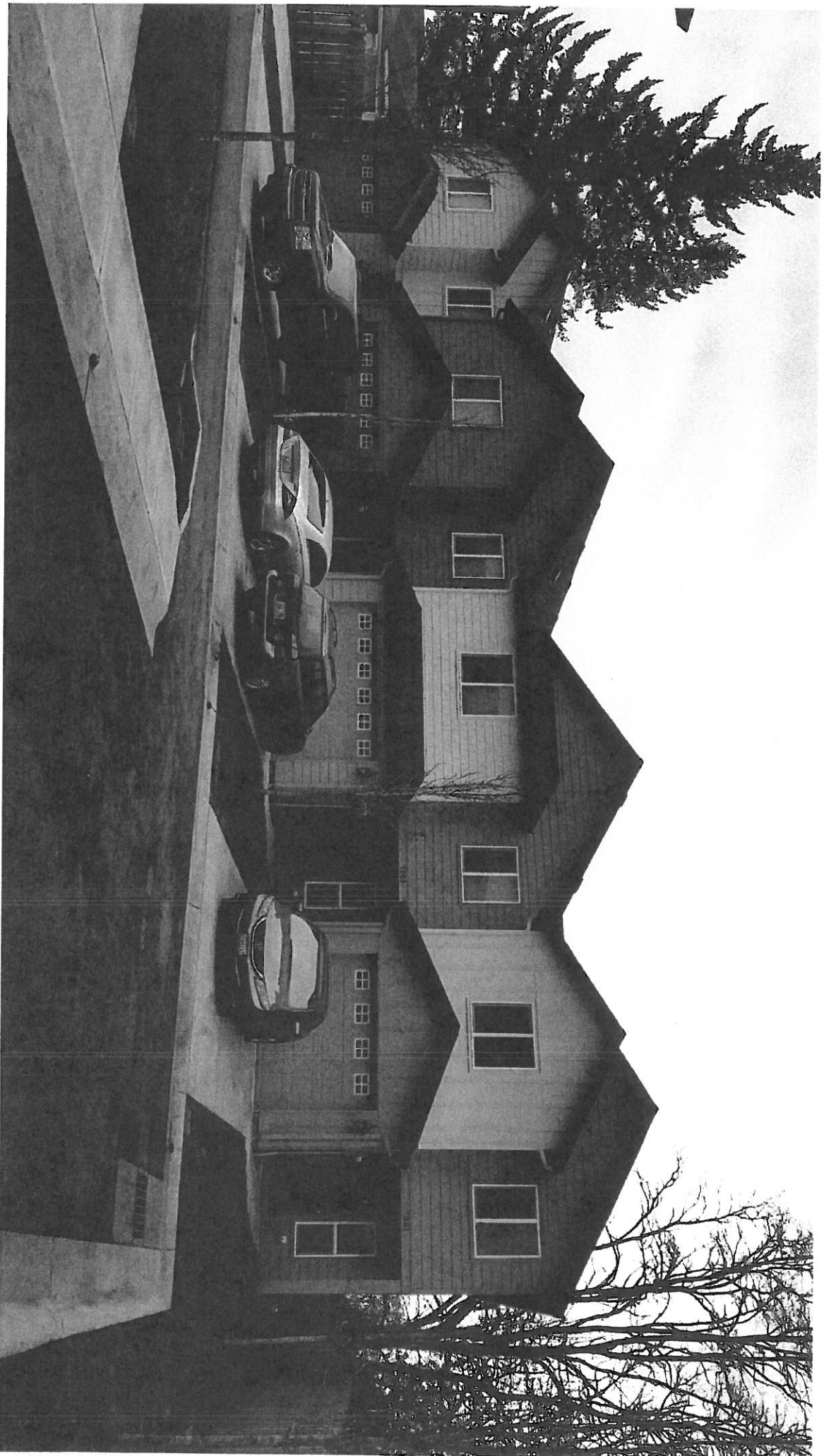
Sub-Committee Chair, Development and Engineering Advisory Board

Attachments and Supporting Information:

- 1) Example of R-18 Detached Single Family
- 2) Example of R-18 Attached Single Family



Pg. 4 of Ex. 10



Pg. 5 of Ex 10



proud past, promising future

CLARK COUNTY
WASHINGTON

DEVELOPMENT and ENGINEERING ADVISORY BOARD

February 11, 2015

Currently, all home businesses are limited to 3 nonresident employees for the urban area and 6 nonresident employees for the rural area. Given Clark County promotes the local economy, home businesses were brought to the attention of the BOCC. The Clark County Planning Commission (PC) proposed an amendment to the County's Home Business provisions (Section 40.260.100) to remove the limit on the maximum number of nonresident employees for major Home Businesses.

The Development and Engineering Advisory Board (DEAB) reviewed and discussed the amendment at their February meeting. The followings are the DEAB concerns regarding the proposed changes:

1. Quality of life will be affected without limitation of employees to home businesses because within residential zones the primary use and purpose is for residential uses and activities and home businesses are an accessory use. Residential areas need to have a residential character and having unlimited employees has the potential to make that character primarily commercial.
2. It will cause more traffic issues and parking issues. Additionally, there is no Transportation Impact Fee (TIF) assessed for home businesses.
3. Private road agreement issues in the rural area have the potential to be raised.
4. The County will spend more money in code enforcement.
5. There will be unintended consequences resulting in code enforcement. Resources for code enforcement are limited.

MOTION: DEAB formally moved and unanimously opposed the proposed changes to lift the limitation of employees for major Home Businesses.

EXHIBIT # 11

From 2007 Buildable Lands Report

Clark County Housing Split

Countywide Planning Policy 1.1.12 in the 2007 *Clark County Comprehensive Plan* specifies that no more than 75 percent of new dwelling units to be a specific product type (i.e. single-family housing). The table below shows single-family and multi-family split from June 30, 2000 to June 30, 2006 for each of the Urban Growth Areas.

Table 5
Single- and Multi-Family Split, 2000-2006

		Single Family			Multi-Family			Total		
		Units	% SF	Acres	Units	% MF	Acres	Units	Acres	Units/Acre
Battle Ground										
	City	1,059	86.9	203.45	160	13.1	9.90	1,219	213.35	5.71
	UGA	25	100.0	71.68	0			25	71.68	0.35
Sub Total		1,084	87.1	275.13	160	12.9	9.90	1,244	285.03	4.36
Camas										
	City	1,346	94.3	281.05	82	5.7	7.94	1,428	288.99	4.94
	UGA	114	100.0	34.57	0			114	34.57	3.30
Sub Total		1,460	94.7	315.62	82	5.3	7.94	1,542	323.56	4.77
La Center										
	City	252	98.4	55.70	4		0.48	256	56.18	4.56
	UGA	2	100.0	7.82	0			2	7.82	0.26
Sub Total		254	98.4	63.52	4		0.48	258	64.00	4.03
Ridgefield										
	City	597	97.7	138.57	14	2.3	0.62	611	139.19	4.39
	UGA	3	100.0	15.20	0			3	15.20	0.20
Sub Total		600	97.7	153.77	14	2.3	0.62	614	154.38	3.98
Vancouver										
	City	3,186	47.2	586.56	3,557	52.8	191.40	6,743	777.96	8.67
	UGA	8,082	94.2	1,393.27	496	5.8	39.42	8,578	1,432.69	5.99
Sub Total		11,268	73.5	1,979.83	4,053	26.5	230.82	15,321	2,210.65	6.93
Washougal										
	City	1,405	93.1	346.32	104	6.9	8.76	1,509	355.08	4.25
	UGA	3	100.0	4.04	0			3	4.04	0.74
Sub Total		1,408	93.1	350.36	104	6.9	8.76	1,512	359.12	4.21
Yacolt										
	City	102	100.0	25.98	0			102	25.98	3.93
	UGA	1		2.00	0			0		
Sub Total		103	100.0	27.98	0			103	27.98	3.68
Rural		2,899	100.0	16,103.97	1	0.0	5.09	2,900	16,109.06	0.18
Total Cities		7,947	67.0	1,637.63	3,921	33.0	219.09	11,868	1,856.72	6.39
Total UGAs		8,230	94.3	1,528.57	496	5.7	39.42	8,726	1,567.99	5.57
Grand Total		16,177	78.6	3,166.20	4,417	21.4	258.51	20,594	3,424.71	6.01

Source: Clark County Community Planning, Tidemark Advantage, Cities of Battle Ground, Camas, La Center, Ridgefield, and Washougal.

2007-2014 HOUSING SPLIT FIGURES

Vancouver Unincorporated UGA

Year	Single Family	Acres	Net Density	Multi-Family	Acres	Net Density	SF/MF Split
2007	904	145.6	6.2	127	3.31	38.4	88%
2008	438	68.8	6.4	29	0.64	45.3	94%
2009	317	55.98	5.7	2	0.14	14.3	99%
2010	401	88.89	4.5	18	0.83	21.7	96%
2011	234	69.97	3.3	206	3.62	56.9	53%
2012	397	88.92	4.5	163	14.49	11.2	71%
2013	646	173.84	3.7	583	25.33	23.0	53%
2014	674	191.06	3.5	87	9.21	9.4	89%
Total	4011	883.06	4.5	1215	57.57	21.1	77%

EXHIBIT # 13